

Mr. John Reynolds, President
Truflo America LLC
P.O. Box 494
Zionsville, IN. 46077

Dear Mr.Reynolds:

Re: Exempt Construction and Operation Status,
095-12845-00113

The application from Truflo America LLC, received on October 17, 2000, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following assembly plant for fans and fan systems to be located at 3620 W. 73rd Street in Anderson, Indiana, is classified as exempt from air pollution permit requirements:

- (a) one [1] Compressed Natural Gas (CNG) powered Fork lift rated at 57 hp.
- (b) seven [7] power vented natural gas-fired heaters rated at 175,000 BTU/hour.

The following conditions shall be applicable:

- (1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:
 - (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

This exemption is the first air approval issued to this source.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) or the Anderson Office of Air Management (AOAM) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

William A. Dorff
Director
Anderson Office of Air Management

WAD

cc: File - Madison County
Madison County Health Department
Air Compliance - Jim Thorpe
Permit Tracking - Janet Mobley
Technical Support and Modeling - Michele Boner
Compliance Data Section - Karen Nowak

**Indiana Department of Environmental Management
Office of Air Quality**

and the

Anderson Office of Air Management

Technical Support Document (TSD) for an Exempted Source

Source Background and Description

Source Name: Truflo America LLC
Source Location: 3620 W. 73rd Street Anderson, IN. 46013
County: Madison
SIC Code: 3564
Operation Permit No.: 095-12845-00113
Permit Reviewer: WA Dorff

The Office of Air Quality (OAQ) has reviewed an application from Truflo America LLC relating to the construction and operation of an assembly plant for fans and fan systems.

New Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) one [1] Compressed Natural Gas (CNG) powered Fork lift rated at 57 hp.
- (b) seven [7] power vented natural gas-fired heaters rated at 175,000 BTU/hour each.

Unpermitted Emission Units and Pollution Control Equipment

There are no un-permitted facilities operating at this source during this review process.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and

additional information submitted by the applicant.

An application for the purposes of this review was received on October 17, 2000, with additional information received on November 8, 2000.

Emission Calculations

See Appendix A pages 1 through 3 of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	-0-
PM-10	-0-
SO ₂	-0-
VOC	0.92
CO	-0-
NO _x	-0-

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants are less than one hundred [100] tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten [10] tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five [25] tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants is less than five [5] tons per year, therefore, the source is subject to the provisions of 326 IAC 2-1.

County Attainment Status

The source is located in Madison County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Unclassified
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule

applicability relating to the ozone standards. Madison County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

- (b) Madison County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	-0-
PM10	-0-
SO ₂	-0-
VOC	0.92
CO	-0-
NO _x	-0-
Single HAP	-0-
Combination HAPs	-0-

- (a) This new source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
(c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR art 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants)

This source does not have potential HAP emissions equal to or greater than ten [10] tons per year, therefore this source is not subject to the provisions of 326 IAC 2-4.1.

326 IAC 2-6 (Emission Reporting)

This source is located in Madison County and the potential to emit VOC and NO_x is less than ten (10) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 8-1-6 (New Facilities - General Reduction Requirement)

This source does not have potential VOC emissions greater than twenty-five [25] tons per year, therefore this source is not subject to the provisions of 326 IAC 8-1-6.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Quality (OAQ) Construction Permit Application Form Y.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached calculations for detailed air toxic calculations. (Appendix A, page 3)

Conclusion

The construction and operation of this assembly plant for fans and fan systems shall be subject to the conditions of the attached proposed Exemption 095-12845-00113.

Appendix A: Emission Calculations

Page 1 of 3 TSD App A

CNG - powered Fork Lift Truck

Company Name: Truflo America LLC

Address City IN Zip: 3260 W. 73rd St. Anderson, IN. 46011

CP: 095-12845-00113

Plt ID: 095-00113

Reviewer: WA Dorff

Date: 03/16/01

Emission Factor* (g/hp-hr)	Fork Lift HP rating**	Hourly Emission Rate (g/hr)	Annual Emission Rate (g/hr)	Conversion (kg/yr)	Conversion (lbs/yr)	Conversion (tons/yr)
1.68	57.00	95.76	838,857.60	838.86	1,849.35	0.92

* Emission factor from EPA's OMS "Exhaust Emission Factors - Spark ignition", NR-010b (EPA420-R-99-09, 5/3/99).

** Fork Lift HP rating provided by the source.

Appendix A: Emission Calculations
Natural Gas Combustion Only
MM Btu/hr 0.3 - < 10
Commercial Boiler

Company Name: Truflo America LLC
Address City IN Zip: 3260 W. 73rd St. Anderson, IN. 46011
CP: 095-12845-00113
Plt ID: 095-00113
Reviewer: WA Dorff
Date: 03/16/01

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

1.225

10.7

Pollutant

	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	12.0	12.0	0.6	100.0	5.3	21.0
Potential Emission in tons/yr	0.1	0.1	0.0	0.5	0.0	0.1

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emission Calculations

Page 3 of 3 TSD App A

Natural Gas Combustion Only

MM Btu/hr 0.3 - < 10

Commercial Boiler

HAPS Emissions

Company Name: Truflo America LLC

Address City IN Zip: 3260 W. 73rd St. Anderson, IN. 46011

CP: 095-12845-00113

Plt ID: 095-00113

Reviewer: WA Dorff

Date: 03/16/01

HAPS - Organics

Emission Factor in lb/MMCF	Benzene 2.1E-003	Dichlorobenzene 1.2E-003	Formaldehyde 7.5E-002	Hexane 1.8E-000	Toluene 3.4E-003
Potential Emissions in Tons/year	1.120E-05	6.439E-06	4.024E-04	9.658E-03	1.824E-05

HAPS - Metals

Emission Factor in lb/MMCF	Lead 5.0E-004	Cadmium 1.1E-003	Chromium 1.4E-003	Manganese 3.8E-004	Nickel 2.1E-003
Potential Emissions in Tons/year	2.683E-06	5.902E-06	7.512E-06	2.039E-06	1.127E-05

Methodology is the same as page 2.

The five [5] highest organics and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.